

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

Civil Action No. 4:22-cv-00249-ALM

DIVYA GADASALLI, an individual,
Plaintiff,

v.

JERRY BULASA, an individual;
DONG LIAN, an individual; DANYUN LIN, an individual;
TD BANK, N.A., a national banking association;
ABACUS FEDERAL SAVINGS BANK, a federal savings bank;
BINANCE HOLDINGS, LTD. d/b/a Binance, a foreign company; and
POLONIEX, LLC, a Delaware limited liability company;
Defendants.

**RENEWED EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER WITHOUT NOTICE
AGAINST DEFENDANT JERRY BULASA**

Plaintiff DIVYA GADASALLI, an individual (“Plaintiff”), by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 65(b) as well as Local Rule CV-7(l), hereby respectfully renews her request that this Court enter without notice to Defendant JERRY BULASA, an individual (“Defendant BULASA”), a Temporary Restraining Order (TRO) against him freezing his assets -- including certain cryptocurrency accounts at BINANCE HOLDINGS, LTD. d/b/a Binance, a foreign company (“BINANCE”); and POLONIEX, LLC, a Delaware limited liability company (“POLONIEX”); and any Cryptocurrency Wallet Addresses (defined below) maintained or controlled by Defendant BULASA, for him, or by/for any entity under his control.¹

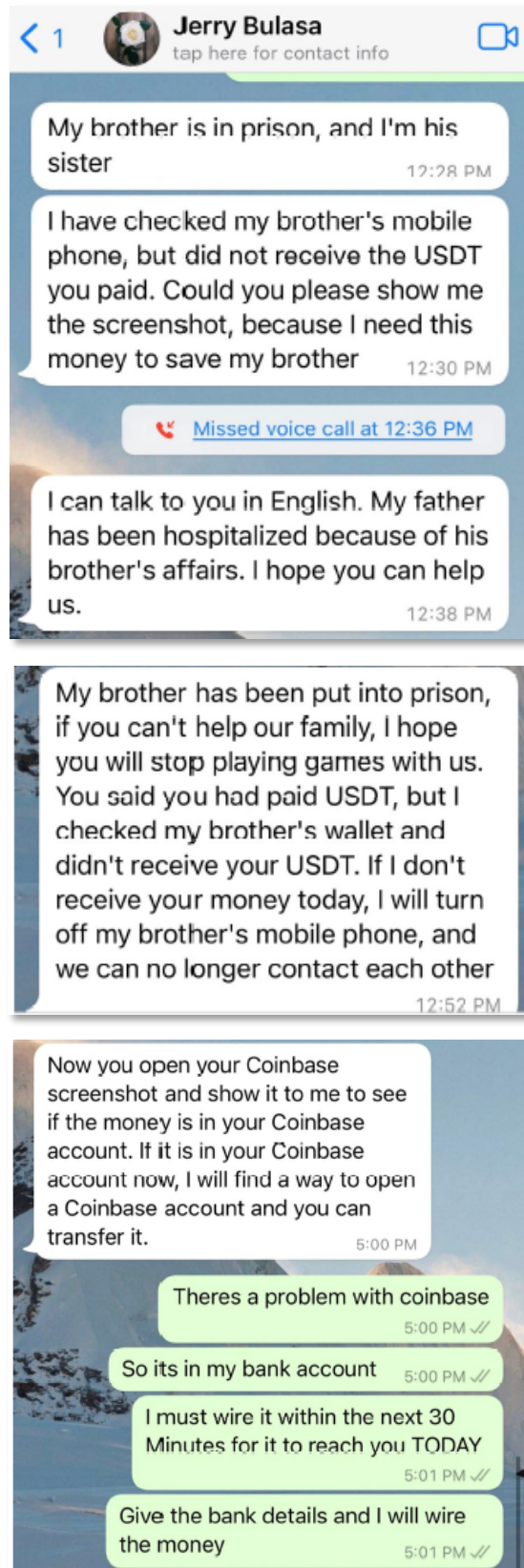
In support of the request for a TRO herein, Plaintiff alleges as follows:

¹ After the Court denied without prejudice Plaintiff’s original Motion for Temporary Restraining Order [Docket Entry No. (“DE”) 10], Plaintiff provided Defendant BULASA a copy of the Complaint, Civil Action Summons, the original Motion for Temporary Restraining Order, and the Order denying that motion [DE 1, 2, 3, 10]. *See*, Declaration of David Silver filed in connection herewith.

FACTUAL BACKGROUND

This action arises from a highly-sophisticated and fraudulent paramour scheme -- a “sha zhu pan” or “pig butchering” scam -- that sought to, and ultimately did, steal from Plaintiff a sum greater than Eight Million Dollars (\$8,000,000.00). “Sha zhu pan” is a Chinese phrase that is translated to English as “pig butchering” to describe the process in which the offender builds a relationship with the victim over months -- frequently romantic, in which the offender showers the victim with messages of love and affection to emotionally “fatten them up” -- similar to fattening a pig, before enticing the victim to invest in a fake company and, metaphorically, slaughtering the victim. Plaintiff was victimized by such a scam.

After meeting online on popular dating service Tinder and communicating frequently via the multi-platform messaging app WhatsApp, Plaintiff and Defendant BULASA sparked and built what appeared to Plaintiff to be a deeply-held affection for, and interest in, one another. As their relationship progressed and Plaintiff's trust in Defendant BULASA grew deeper, Defendant BULASA -- with false promises of romance and of financial prosperity through cryptocurrency investments -- induced from Plaintiff monetary transfers with financially devastating results. In all, Defendant BULASA induced from Plaintiff monetary transfers in a total sum that exceeds Eight Million Dollars (\$8,000,000.00); **and as recently as the date of this filing (as evidenced by the following screenshots from Plaintiff's cellphone), Defendant BULASA continues to prey upon Plaintiff by deepening his scheme with outlandish false claims aimed at extracting additional sums from Plaintiff:**



To effectuate his scheme, Defendant BULASA first enlisted Defendants DONG LIAN and DANYUN LIN to assist in receiving from Plaintiff fraudulently procured wire transfers to bank accounts Defendants LIAN and LIN maintained at TD BANK, N.A. and ABACUS FEDERAL SAVINGS BANK -- wire transfers that were ultimately placed under Defendant BULASA's control. Plaintiff, based on Defendant BULASA's representations and advice, wired Three Hundred Ninety-Six Dollars (\$396,000.00) to bank accounts at TD BANK and ABACUS BANK purportedly maintained or controlled by Defendants DONG LIAN and DANYUN LIN -- who Defendant BULASA told Plaintiff were investors with whom he worked who already held cryptocurrency in accounts Defendant BULASA oversaw², thusly:

DATE OF WIRE TRANSFER	BANK	BANK ACCOUNT TO WHICH FUNDS WERE WIRED	PAYEE	AMOUNT TRANSFERRED
May 13, 2021	TD Bank	***8000	Dong Lian	\$10,000.00
May 15, 2021	Abacus Federal Savings Bank	***0334	Dong Lian	\$86,000.00
May 26, 2021	Abacus Federal Savings Bank	***0334	Dong Lian	\$100,000.00
June 2, 2021	TD Bank	***2161	Danyun Lin	\$200,000.00
	TOTAL			\$396,000.00

In return for the funds wired to them, Defendant LIAN and Defendant LIN transferred to Plaintiff cryptocurrency, which she then forwarded to a cryptocurrency account controlled by Defendant BULASA so he could invest it in accordance with his purported cryptocurrency expertise. Under Defendant BULASA's guidance, Plaintiff also opened a cryptocurrency account at U.S.-based cryptocurrency exchange Coinbase which she funded with additional family monies that were used to

² Upon information and belief, Defendant BULASA, Defendant LIAN, and Defendant LIN might be the same person or, in the alternative, are three individuals who conspired with one another to perpetrate the fraud upon Plaintiff detailed herein.

purchase cryptocurrency that was subsequently transferred to cryptocurrency investment firm accounts operated by Defendant BULASA.

In addition to the May 2021 and early-June 2021 bank wire transfers to Defendant LIAN and Defendant LIN, Plaintiff funded her Coinbase account with approximately Six Million Dollars (\$6,000,000.00); used those funds to purchase cryptocurrency, and then sent that cryptocurrency to an investment account allegedly created for Plaintiff that was overseen by Defendant BULASA. Plaintiff has since learned that the account into which Defendant BULASA purported to be storing Plaintiff's cryptocurrency is a fake cryptocurrency exchange that served as an engine of theft for Defendant BULASA -- providing him a mechanism to proffer Plaintiff false account statements and real-time values of cryptocurrency markets on legitimate exchanges that masked the fraudulent scheme Defendant BULASA was perpetrating upon Plaintiff.

While transferring to Defendant BULASA approximately Two Million Dollars (\$2,000,000.00) more in fiat currency and cryptocurrency assets, Defendant BULASA provided Plaintiff a series of excuses alleging that obstacles beyond his control were encumbering Plaintiff's assets and preventing her from accessing those assets. In truth, those obstacles were devised by Defendant BULASA to obfuscate his activities and create both time and distance between himself and Plaintiff so he could abscond with her assets.

Through blockchain analytics tracing the path of Plaintiff's cryptocurrency assets, it has become apparent that Defendant BULASA has filtered through multiple cryptocurrency exchanges and wallets -- all without Plaintiff's knowledge or authorization -- nearly all if not all of the assets he stole from Plaintiff. Among the cryptocurrency exchange addresses/wallet addresses that have thus far been identified are the following:

#	EXCHANGE	DESTINATION ADDRESS	ASSET TYPE	ASSETS UNDER CLAIM (average confirmed with five separate tracing methodologies; in cryptocurrency unit)
1	Binance	9ea12866d4b69b347ffff084fc4bb3b97cc4d4b4	USDT	351,456.322587
2	Binance	f52fb20441641e2c446c7db9c2ebee9b80611679	USDT	138,928.623847
3	Binance	1838f42bc8e28f0799e21501620e5a93dd32f107	USDT	126,574.190249
4	Binance	9c9ba31722261aced59373b53cf567ca96243f57	USDT	105,389.848449
5	Binance	2944f6937dcf1ef0b4a005619a35c2e4757bcee0	USDT	98,964.245785
6	Binance	e42bee8902895f6f228e1b20e40a7d410ff508bf	USDT	93,679.797809
7	Binance	b22270560cdec8cf281ea6f87c14cb24037421be	USDT	89,273.852767
8	Binance	e15ba3e0824f97f4b0f841cf030021097eaf2108	USDT	87,098.577482
9	Binance	497025d44131d4a261705368f8c1cf4b6025897a	USDT	58,462.166853
10	Binance	7f90ef04ba3ed5b1f7908d8e0463a6975227d4f8	USDT	18,795.819565
11	Binance	1a2893432d0615a0764a311b5d2a6062dc212c9d	USDT	18,717.887253
12	Binance	5e65b32ee4f6a63a0678a43f9439eb421457d950	USDT	13,903.728216
13	Binance	70fc0e221578f6d47f958cfa2bfff1f9320bc6eec	USDT	8,402.510102
14	Binance	430ddd14ad41c97dd09d8df94e00f3eb65b7c694	USDT	4,877.660928
15	Binance	44a11506b275dc619a1c5a20dc8969ea305c8dd7	USDT	4,391.864424
16	Binance	88dfbd93f509d0b3dcbfd86ee9d6d036ca199ea5	USDT	4,212.498994
17	Binance	1fe77c00c81e32c50494e2c73a1ce945dd7215a0	USDT	3,908.191703
18	Binance	7db77e4c967c95a5a9e2ec57ec21788dab481893	USDT	2,281.305709
19	Binance	6d6ab7dbc46ab652eaf4b09827e0de9cc18bc364	USDT	1,406.698380
			TOTAL	1,230,725.791102 USDT

1	Poloniex	1ArN6zUiCYuyQVrujb5iMUvBXw7HxzYjPo	BTC	10.11113414
2	Poloniex	14kahPazCQEYEWKmeR5JG8mZh66W9caQqe	BTC	7.50000000
3	Poloniex	1LQ9Mrbvdv5QFe5PdzW7sTxHexkpRoHmMN	BTC	7.312601758
4	Poloniex	12XwnGBjU6Hp4ecVv61tRDSGdW3SXkt8CP	BTC	6.920274378
5	Poloniex	1CCNdKHhqtK4ZauZ7PWgFvDBpZ59MXjP2	BTC	6.11926921
6	Poloniex	17Z3S2pfjGQj6QH39j1UPfoGJJ2kqkWSem	BTC	4.45347371

7	Poloniex	13mLXtUtSkvPqU8qAv81njLSwe4DAnCrPR	BTC	2.976871542
8	Poloniex	1Ko5ntJvnGhUYfTmseFJxBuereCi6TF7Tfp	BTC	0.51755494
TOTAL				45.91117968 BTC ³

#	CRYPTOCURRENCY WALLET ADDRESS	ASSET TYPE	ASSETS UNDER CLAIM (average confirmed with five separate tracing methodologies; in cryptocurrency unit)
1	365aca59aeb17df6e3a76ec2bdbefe9983f586c5	USDT	210,075
2	e71010a991fff28c221dfb2aca207c129ff9cf1b	USDT	86,695.1041952
3	6cca6bde94ad75bfb1e21720677ae9c1f296f607	USDT	53,522
4	cdce3f15ecb6da711700994fa7c838e45f107f24	USDT	49,354.6025112
5	f7b7a705d7ac47452eaaff796601271bfc42c43a	USDT	41,678.0702184
6	3b53e49200546344d7bb31a334e24421a3cb4451	USDT	22,359.9849322
7	98022e367dceb0a25317f0e68b949ad3bd7a3571	USDT	18,591.4968140
8	2dd59e945a3c036444e37f31d3b2f001d93eefb1	USDT	17,020.0423440
9	5fcd1e9ffdc4f207dfe7f0cfdb67d286b0b0162	USDT	16,282.1040658
10	7d65a55862aa569f96e31e50c4e6def0b34f05ed	USDT	7,403.3527816
11	6af4eba5f8b339512960ebef11e02815c42b8c00	USDT	5,352.8389960
12	4d27a8e567e4f7b51d1a07ff0cc032d78b0d43d0	USDT	3,141.6391760
13	3cb3c884b033fc0dd22c2c8439edd9eece8818c	USDT	1,690.8607544
14	12a2dfcac61118e26197ed1a581099faf4dc16e2	USDT	655.0425430
15	a21675225d76975635cea38b70e874f0a685bf1d	USDT	414.5838890
16	e01d86cf1fa41d6d5d685b3c13555c79fc3aa798	USDT	15.9851010
17	5ea54787b09bc81c191a4037f36313d82e407a64	USDT	6.3173528
18	a2193eb903a185ae3afd05ef461687a221e04adb	USDT	4.4477338
19	3e362670c657b6e45e792510cd57980466f09194	USDT	0.1941922
TOTAL			534,263.6676006 USDT

³ As of the date of this filing, 45.91117968 BTC are valued at approximately \$2,203,736.62 USD (\$48,000.00 per BTC).

As a result of the foregoing scheme, Plaintiff has lost over \$8,000,000.00 and is left trying to get answers from Defendant BULASA, Defendant LIAN, and Defendant LIN; who are unwilling to help Plaintiff uncover where her funds are or where they went after they left Plaintiff's control. Not only are the individual defendants unwilling to assist Plaintiff, Defendant BULASA to this day (as the above-included screenshots show) is still shamelessly spinning outlandish lies in an effort to steal additional funds from Plaintiff.

Given these facts, Plaintiff commenced this action and is entitled to a Temporary Restraining Order freezing Defendant BULASA's assets -- including any cryptocurrency exchange accounts owned or controlled by Defendant BULASA that are tied to the BINANCE Destination Addresses, the POLONIEX Destination Addresses, and any Cryptocurrency Wallet Addresses maintained by Defendant BULASA, for him, or by any entity under his control -- to preserve the *status quo ante* pending the outcome of this litigation.

LEGAL ARGUMENT

I. Rule 65 Permits Entry of a Temporary Restraining Order Without Notice

1. Rule 65 permits this Court to enter a Temporary Restraining Order without notice to the adverse parties if "specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury . . . will result to the movant before the adverse party can be heard in opposition."⁴ Further, the movant's counsel must certify in writing "any efforts made to give notice and the reasons why it should not be required."⁵

2. As to the first prong of Rule 65(b)(1), the sworn Declaration Plaintiff has filed in support hereof shows the likelihood of immediate and irreparable injury or loss. Plaintiff was clearly

⁴ Fed.R.Civ.P. 65(b)(1)(A).

⁵ Fed.R.Civ.P. 65(b)(1)(B). *See also, Mesa v. Wells Fargo Bank, N.A.*, 2017 WL 9285517 at *1 (E.D. Tex. Sept. 1, 2017).

defrauded and robbed by Defendant BULASA; and the stone wall of obfuscation that has been erected by anonymous nature of cryptocurrency transactions significantly inhibits Plaintiff's ability to trace her stolen funds or even identify Defendant BULASA by his proper legal name at this point.

3. By freezing Defendant BULASA's assets -- including any accounts at BINANCE and POLONIEX and any secondary cryptocurrency addresses to which Defendant BULASA transferred any portion of the funds stolen from Plaintiff -- Plaintiff will have a foothold in her arduous climb to recovering her stolen money before Defendant BULASA can further transfer it beyond Plaintiff's reach.

4. With regard to the second prong of Rule 65(b)(1), a TRO is warranted without notice to Defendant BULASA. After the Court denied without prejudice Plaintiff's original Motion for Temporary Restraining Order, Plaintiff provided Defendant BULASA a copy of the Complaint, Civil Action Summons, the original Motion for Temporary Restraining Order, and the Order denying that motion [DE 1, 2, 3, 10] through the electronic messaging service WhatsApp -- the means of communication through which Plaintiff and Defendant BULASA have communicated and which Plaintiff and Defendant BULASA have used to correspond with one another dozens of times per day. *See*, Declaration of David Silver filed in connection herewith. Counsel advised Defendant BULASA:

Although the above-referenced motion was denied by the Court because you had not been provided prior notice of the relief sought therein; now that we have provided you notice, we will be reapplying to the Court for the same relief. To the extent you wish to oppose the relief requested, you should appear before the Court to defend your rights and/or your legal interests as you see prudent.

Id. As of this filing, Defendant BULASA has not responded to counsel.

II. The Court Can Issue an Injunction to Freeze Assets in this Action for Equitable Relief

5. Under the general rule, federal courts lack the authority to freeze assets of a defendant before the claims have been brought to judgment. *See, Grupo Mexicano de Desarrollo S.A. v. Alliance Bond Fund, Inc.*, 527 U.S. 308, 322 (1999). However, when the plaintiff is seeking equitable relief, as opposed to merely legal damages, a district court may order a preliminary injunction to secure an equitable

remedy and “an asset freeze by preliminary injunction is an appropriate method to assure the meaningful, final equitable relief sought.” *Federal Sav. & Loan Ins. Corp. v. Dixon*, 835 F.2d 554, 561 (5th Cir. 1987). In *Dixon*, the Fifth Circuit specifically noted that “once a plaintiff establishes an equitable cause of action, the district court may use its full equitable powers to grant appropriate preliminary relief as well.” *Id.* At 562.

6. Moreover, Rule 64 of the Federal Rules of Civil Procedure provides that when state law authorizes a prejudgment remedy to secure assets subject to a plaintiff’s state law claims, state law governs such relief. Rule 64, Fed.R.Civ.P.; *Granny Goose Foods, Inc. v. Bhd. of Teamsters Local 70*, 415 U.S. 423, 436 n. 10 (1974).

7. Here, Plaintiff seeks equitable relief in addition to her legal remedies and is entitled to an injunction to maintain the *status quo* until the claims in the Complaint can be resolved. Amongst other claims and remedies sought, Plaintiff alleges violations of numerous common law torts (fraudulent inducement, negligent misrepresentations, conversion, and civil conspiracy) and requests relief in the following form of equity:

- An Order imposing a **constructive trust** to be effectuated by Defendant TD BANK AND ABACUS BANK and full disgorgement of all funds in TD BANK’s and ABACUS BANK’s possession, custody, or control that were wrongfully misappropriated, converted, and stolen from Plaintiff.
- the equitable imposition of a constructive trust over the property taken from Plaintiff that is currently held by Defendant BULASA, an individual, in any cryptocurrency exchange accounts owned or controlled by Defendant BULASA that are tied to the BINANCE Destination Addresses, the POLONIEX Destination Addresses, and any Cryptocurrency Wallet Addresses maintained by Defendant BULASA, for him, or by any entity under his control; and [entry of an Order] that the wrongfully obtained property be restored to Plaintiff.

8. Additionally, with regard to the claim for imposition of a constructive trust, Texas courts have authorized equitable injunctive relief to secure the assets subject to the claim. *Nwokedi v. Unlimited Restoration Specialists, Inc.*, 428 S.W.3d 191, 210 (Tex. App. 2014)

9. Accordingly, Plaintiff is entitled to a Temporary Restraining Order if the other requirements for a Temporary Restraining Order have been met. For the reasons described below, Plaintiff is entitled to such relief.

III. A Temporary Restraining Order Is Appropriate to Prevent Immediate and Irreparable Harm

10. The standard for issuing a Temporary Restraining Order is identical to the standard for issuing a preliminary injunction. See *Clark v. Prichard*, 812 F.2d 991, 993 (5th Cir. 1987). In considering a Temporary Restraining Order or preliminary injunction, the Court must consider the following: (1) the substantial likelihood that the plaintiff will prevail on the merits; (2) a substantial threat that irreparable harm will result if the injunction is not granted; (3) whether the threatened injury outweighs the threatened harm to the defendant; and (4) the granting of the preliminary injunction will not disserve the public interest.” *Id.* At 993. As shown below, Plaintiff satisfies each element of that standard.

IV. Plaintiff Has a Substantial Likelihood of Success on the Merits of Her Claims

11. The harms alleged in the Complaint, as well as the facts set forth in the declaration executed by Plaintiff, make clear that Plaintiff was victimized by Defendant BULASA, Defendant LIAN, and Defendant LIN who – through actual fraud, misappropriation, conversion, theft, or other questionable means -- obtained Plaintiff’s cryptocurrency and fiat currency, which in equity and good conscience they should not be permitted to hold.

12. Based on that fraudulent behavior, Plaintiff has asserted claims for: (1) fraudulent inducement, (2) negligent misrepresentation, (3) conversion, and (4) civil conspiracy.

13. Moreover, any and all monies being held by TD BANK and ABACUS BANK must be held in a constructive trust for Plaintiff’s benefit, as neither Defendant BULASA nor Defendant LIAN or Defendant LIN is entitled to the benefit of wrongfully misappropriated, converted, and stolen funds and cryptocurrency assets that were taken from Plaintiff.

14. Further, any and all cryptocurrency assets held in any cryptocurrency exchange accounts owned or controlled by Defendant BULASA that are tied to the BINANCE Destination Addresses, the POLONIEX Destination Addresses, and any Cryptocurrency Wallet Addresses maintained by Defendant BULASA, for him, or by any entity under his control to which Defendant BULASA transferred any portion of the funds stolen from Plaintiff must be held in a constructive trust for Plaintiff's benefit, as Defendant BULASA is not entitled to the benefit of wrongfully misappropriated, converted, and stolen funds and cryptocurrency assets that were taken from Plaintiff.

15. In light of the foregoing, there is a high likelihood Plaintiff will succeed on her claims.

16. As for Plaintiff's request that a constructive trust be applied, Texas law provides that a constructive trust is "an equitable remedy created by the courts to prevent unjust enrichment." *Troxel v. Bishop*, 201 S.W.3d 290, 297 (Tex.App.-Dallas 2006). To impose a constructive trust, the proponent must prove the following: (1) breach of a special trust, fiduciary relationship, or actual fraud; (2) unjust enrichment of the wrongdoer; and (3) tracing to an identifiable res. *Id.*

17. As explained above, Defendant BULASA solicited and/or accepted from Plaintiff large sums of funds while withholding from Plaintiff certain material facts that, if disclosed, would have prevented the fraudulent scheme enacted by Defendant BULASA, Defendant LIAN, and Defendant LIN from perpetuating itself to the detriment of Plaintiff. Plaintiff submits that actual fraud, abuse of confidence reposed and accepted, and other highly questionable means were employed by these defendants; and equity and good conscience should not permit Defendant BULASA, Defendant LIAN, and Defendant LIN to continue holding the spoils of their scheme.

18. Moreover, through blockchain analytics following the path of Plaintiff's stolen cryptocurrency assets, one can trace the stolen assets to an identifiable res.

19. As such, success on the merits of Plaintiff's common law claims is very likely.

V. Plaintiff Will Suffer Irreparable Harm if Defendant Bulasa Is Not Enjoined

20. There is a significant risk that Defendant BULASA may dissipate the money stolen from Plaintiff or simply transfer those funds into untraceable cryptocurrency accounts or to offshore entities organized in unknown locations.

21. Considering the unreliability and fraudulent tactics Defendant BULASA has displayed (and continues to display through the date of this motion), it is imperative to freeze Defendant BULASA's assets, including any cryptocurrency exchange accounts owned or controlled by Defendant BULASA that are tied to the BINANCE Destination Addresses, the POLONIEX Destination Addresses, and any Cryptocurrency Wallet Addresses maintained by Defendant BULASA, for him, or by any entity under his control, to maintain the *status quo* to avoid dissipation of the money illegally taken from Plaintiff.

22. Considering the speed with which cryptocurrency transactions are made as well as the anonymous nature of those transactions, it is imperative to freeze Defendant BULASA's assets to maintain the *status quo* to avoid dissipation of the money illegally taken from Plaintiff.

23. In fact, Plaintiff has already discovered through cryptographic tracing that the following assets have been transferred by Defendant BULASA or someone believed to be acting at his behest as recently as the date of filing this motion:

	EXCHANGE	DESTINATION ADDRESS	ASSET TYPE	ASSETS UNDER CLAIM (average confirmed with five separate tracing methodologies; in cryptocurrency unit)
1	Binance	9ea12866d4b69b347ffff084fc4bb3b97cc4d4b4	USDT	351,456.322587
2	Binance	f52fb20441641e2c446c7db9c2ebee9b80611679	USDT	138,928.623847
3	Binance	1838f42bc8e28f0799e21501620e5a93dd32f107	USDT	126,574.190249
4	Binance	9c9ba31722261aced59373b53cf567ca96243f57	USDT	105,389.848449

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6	Binance	e42bee8902895f6f228e1b20e40a7d410ff508bf	USDT	93,679.797809
7	Binance	b22270560cdec8cf281ea6f87c14cb24037421be	USDT	89,273.852767
8	Binance	e15ba3e0824f97f4b0f841cf030021097eaf2108	USDT	87,098.577482
9	Binance	497025d44131d4a261705368f8c1cf4b6025897a	USDT	58,462.166853
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12	Binance	5e65b32ee4f6a63a0678a43f9439eb421457d950	USDT	13,903.728216
13	Binance	70fc0e221578f6d47f958cfa2bfff1f9320bc6ecc	USDT	8,402.510102
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17	Binance	1fe77c00c81e32c50494e2c73a1ce945dd7215a0	USDT	3,908.191703
18	Binance	7db77e4c967c95a5a9e2ec57ec21788dab481893	USDT	2,281.305709
19	Binance	6d6ab7dbc46ab652eaf4b09827e0de9cc18bc364	USDT	1,406.698380
			TOTAL	1,230,725.791102 USDT

1	Poloniex	1ArN6zUiCYuyQVrujb5iMUvBXw7HxzYjPo	BTC	10.11113414
2	Poloniex	14kahPazCQEyEwKmeR5JG8mZh66W9caQqe	BTC	7.50000000
3	Poloniex	1LQ9Mrbv5v5QFe5Pdzw7sTxHexkpRoHmMN	BTC	7.312601758
4	Poloniex	12XwnGBjU6Hp4ecVv61tRDSGdW3SXkt8CP	BTC	6.920274378
5	Poloniex	1CCNdKHhqtK4ZauZ7PWgFvDBpZ59MXjP2	BTC	6.11926921
6	Poloniex	17Z3S2pfjGQj6QH39j1UPfoGJJ2kqkWSem	BTC	4.45347371
7	Poloniex	13mLXtUtSkvPqU8qAv81njLSwe4DAnCrPR	BTC	2.976871542
8	Poloniex	1Ko5ntJvnGhUYfTmseFJxBuereCi6TF'Tfp	BTC	0.51755494
			TOTAL	45.91117968 BTC ⁶

⁶ As of the date of this filing, 45.91117968 BTC are valued at approximately \$2,203,736.62 USD (\$48,000.00 per BTC).

#	CRYPTOCURRENCY WALLET ADDRESS	ASSET TYPE	ASSETS UNDER CLAIM (average confirmed with five separate tracing methodologies; in cryptocurrency unit)
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3	6cca6bde94ad75bfb1e21720677ae9c1f296f607	USDT	53,522
4	cdce3f15ecb6da711700994fa7c838e45f107f24	USDT	49,354.6025112
5	f7b7a705d7ac47452eaaff796601271bfc42c43a	USDT	41,678.0702184
6	3b53e49200546344d7bb31a334e24421a3cb4451	USDT	22,359.9849322
7	98022e367dceb0a25317f0e68b949ad3bd7a3571	USDT	18,591.4968140
8	2dd59e945a3c036444e37f31d3b2f001d93eebf1	USDT	17,020.0423440
9	5fcd1e9ffdc4f207dfe7f0cfdb67d286b0b0162	USDT	16,282.1040658
10	7d65a55862aa569f96e31e50c4e6def0b34f05ed	USDT	7,403.3527816
11	6af4eba5f8b339512960ebef11e02815c42b8c00	USDT	5,352.8389960
12	4d27a8e567e4f7b51d1a07ff0cc032d78b0d43d0	USDT	3,141.6391760
13	3cb3c884b033fc0dd22c2c8439edd9eecece8818c	USDT	1,690.8607544
14	12a2dfcac61118e26197ed1a581099faf4dc16e2	USDT	655.0425430
15	a21675225d76975635cea38b70e874f0a685bf1d	USDT	414.5838890
16	e01d86cf1fa41d6d5d685b3c13555c79fc3aa798	USDT	15.9851010
17	5ea54787b09bc81c191a4037f36313d82e407a64	USDT	6.3173528
18	a2193eb903a185ae3afd05ef461687a221e04adb	USDT	4.4477338
19	3e362670c657b6e45e792510cd57980466f09194	USDT	0.1941922
		TOTAL	534,263.6676006 USDT

The large number of cryptocurrency addresses further emphasizes the ease with which Defendant BULASA is transferring Plaintiff's stolen assets and the difficulty with which Plaintiff is faced in tracking down her stolen assets.

VI. There Is Little Prejudice to Defendant Bulasa If the Temporary Restraining Order Is Entered

25. While Plaintiff would be severely prejudiced if Defendant BULASA dissipates the funds wrongfully taken from Plaintiff, Defendant BULASA faces no such prejudice. An order forbidding Defendant BULASA from moving his assets will, at worst, delay Defendant BULASA from shifting his purloined funds to an untraceable cryptocurrency accounts; and at best, will help maintain the *status quo* for Plaintiff to recover the millions of dollars illegally obtained through Defendants' fraudulent scheme.

VII. Plaintiff Has No Adequate Remedy at Law

26. Plaintiff's only remedy to recover the funds fraudulently taken from her is through her right to equitable relief in the form of an injunction to asset dissipation by Defendant BULASA, beginning with imposition of a restraining order to prevent the dissipation of Plaintiff's assets. A legal remedy for monetary relief alone will not adequately protect Plaintiff's equitable ownership interest in those funds and assets that can disappear with the click of a computer mouse.

VIII. Entering a Temporary Restraining Order Is In the Public Interest

27. The public interest strongly supports entry of a temporary restraining order here.

28. Moreover, entering a temporary restraining order would serve the public interest by promoting the objectives of the Financial Crimes Enforcement Network [FinCEN] (a division of the U.S. Department of the Treasury) by providing assurance that courts will protect investors' assets from theft and will aid investors in their recovery of stolen assets when they can be readily located and traced to specific locations, like the purloined investor assets in this action.

CONCLUSION

For the foregoing reasons, Plaintiff DIVYA GADASALLI, respectfully requests that this Court find that Plaintiff has satisfied the elements of her claim for preliminary injunctive relief and that the Court enter a Temporary Restraining Order without notice to Defendant BULASA, freezing his assets -- including any cryptocurrency exchange accounts owned or controlled by Defendant BULASA that are tied to the BINANCE Destination Addresses, the POLONIEX Destination Addresses, and any Cryptocurrency Wallet Addresses maintained by Defendant BULASA, for him, or by any entity under his control to which Defendant BULASA transferred any portion of the funds stolen from Plaintiff -- to preserve the *status quo ante* pending the full adjudication of Plaintiffs' claims.

Respectfully submitted,

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By:  _____

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Dated: March 30, 2022